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March 25, 2022

**BY ECF**

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

We write in relation to recent letters submitted by Baumeister & Samuels, ECF No. 7792, and Broder & Reiter, ECF No. 7793, to clarify a minor point regarding the communications between the parties.

As the Court is aware, our firm has taken lead on behalf of all *Ashton* plaintiffs in a range of settings in this MDL, and counsel for the *Burnett*, *O'Neill*, and *Federal Insurance* plaintiffs understood that we were participating in the recent discussions relating to the Da Afghanistan Bank holdings at the Federal Reserve in New York on behalf of all *Ashton* plaintiffs, and that we would handle downstream communications with our *Ashton* co-counsel. We kept most *Ashton* co-counsel apprised that there were ongoing discussions about a possible agreement and relayed information as it became available. Earlier this week, we updated *Ashton* co-counsel concerning the recent discussions and the agreement between the *Federal Insurance*, *Burnett*, *O'Neill* and *Havlish* plaintiffs. We are working to facilitate a coordinated approach on behalf of the *Ashton* group, to the extent feasible.

Respectfully Submitted,

By: /s/ Andrew J. Maloney  
Andrew J. Maloney, III